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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11  
:   
RESIDENTIAL CAPITAL, LLC, et al., : Case No. 12-12020 (MG)  
:   
Debtors. : Jointly Administered  
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**SECOND SUPPLEMENT TO WORK PLAN OF  
ARTHUR J. GONZALEZ, EXAMINER**

TO THE HONORABLE MARTIN GLENN,  
UNITED STATES BANKRUPTCY JUDGE:

Arthur J. Gonzalez, the Court-appointed Examiner (the "Examiner") in the above-captioned cases, by his undersigned counsel, hereby submits this Second Supplement to his Work Plan filed with this Court on August 6, 2012 [Docket No. 1010] (as amended by Supplement to Work Plan of Arthur J. Gonzalez, Examiner, filed with this Court on August 23, 2012 [Docket No. 1240]) (as so amended, the "Work Plan").<sup>1</sup>

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<sup>1</sup> Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Work Plan.

As discussed at chambers conferences held on November 5, 19 and 20, 2012, the time frame for the preparation of the Examiner's report as set forth in paragraph 27 of the Work Plan would be modified as follows:

1. Based on discussions between the Examiner's professionals and third parties (the "Discovery Parties"), and commitments made by the Discovery Parties to the Examiner's professionals, the Examiner expects the primary producing parties to substantially complete document production by January 31, 2013. Similarly, based on the current confirmed schedule for ongoing witness interviews (and anticipated dates for future interviews), the Examiner expects that witness interviews (and depositions as necessary) will be substantially completed by February 28, 2013. Given that schedule, the Examiner intends to deliver his report in early April, 2013. This extension of time to complete the Examiner's report will have a correlative effect upon the estimated budget for fees and expenses to be incurred by the Examiner as provided in the Work Plan.

2. The Discovery Parties have in most cases been cooperative in responding to the requests of the Examiner. The Examiner is mindful of the Discovery Parties' other competing commitments and obligations, as well as the expansion of some of the discovery requests made by the Examiner. All of those factors have contributed to this modification of the projected date for the completion of the report. Furthermore, the Examiner is mindful of the importance of his report to the case and will continue to seek the discovery he needs to complete his report. Given that the amended time frame is wholly dependent upon the timely completion of document production and witness interviews (and depositions as necessary) of and by the Discovery Parties, the Examiner is prepared to return to the Court promptly for appropriate relief if he

perceives that discovery delays are jeopardizing the timely delivery of the Examiner's report.

Dated: New York, New York  
November 26, 2012

**CHADBOURNE & PARKE LLP**

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